

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:)	CHAPTER 13
GREGGORY ROBERT NORTH and)	
MELANIE ANN NORTH,)	CASE NO.: 19-51730-PMB
)	
DEBTORS.)	

CHAPTER 13 TRUSTEE'S SUPPLEMENTAL OBJECTION TO
CONFIRMATION AND MOTION TO DISMISS

COMES NOW MELISSA J. DAVEY, Chapter 13 Trustee, and objects to confirmation of the plan and files this Motion to Dismiss under 11 U.S.C. Section 1307(c), for cause, including the following reasons:

1. The plan as proposed will extend beyond sixty (60) months, contrary to 11 U.S.C. Section 1322(d).
2. Pursuant to information received from the Internal Revenue Service, 2014 through 2018 tax returns have not been provided to the taxing authorities, preventing the Chapter 13 Trustee from evaluating the feasibility of the Chapter 13 Plan in violation of 11 U.S.C. Sections 1322(d) and 1325(a)(6).

WHEREFORE, the Trustee moves the Court to inquire into the above objections at the separately scheduled and noticed confirmation hearing, deny confirmation of the Chapter 13 Plan, dismiss the case, and for such other and further relief that this Court deems just and proper.

May 16, 2019

/s/Jason L. Rogers

Jason L. Rogers
Attorney for the Chapter 13 Trustee
GA Bar No. 142575
260 Peachtree Street, NW, Suite 200
Atlanta, GA 30303
(678) 510-1444 Phone
(678) 510-1450 Fax

19-51730-PMB

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing Supplemental Objection to Confirmation and Motion to Dismiss using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

Lisa F. Caplan lcaplan@rubinlublin.com,
ruluecf@gmail.com; akhosla@rubinlublin.com; nbrown@rubinlublin.com; mhashim@rubinlublin.com; j
dabbs2@rubinlublin.com; RULUECF@GMAIL.COM; BKRL@ecf.courtdrive.com
E. L. Clark ecfnofices@cw13.com, cwatlantabk@gmail.com

I further certify that on this day I caused a copy of this document to be served via United States First Class Mail on the following parties set forth below at the address shown for each.

DEBTOR(S):
GREGGORY ROBERT NORTH
MELANIE ANN NORTH
108 MADISON STREET
HOLLY SPRINGS, GA 30115

Dated: May 16, 2019

Prepared and Presented by:

/s/Jason L. Rogers

Jason L. Rogers
Attorney for the Chapter 13 Trustee
GA Bar No. 142575
260 Peachtree Street, NW, Suite 200
Atlanta, GA 30303
(678) 510-1444 Phone
(678) 510-1450 Fax